



THE CITY OF NEW YORK
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October 25, 2024

BY ECF

Honorable Magistrate Judge Vera M. Scanlon
United States District Court
Eastern District of New York
225 Cadman Plaza East, 1214 South
Brooklyn, New York 11201

Re: Joseph Garofalo v. New York City, et al., 22 CV 7620 (NM)(VMS)

Dear Magistrate Judge Scanlon:

I am an attorney in the office of Hon. Sylvia O. Hinds-Radix, Corporation Counsel of the City of New York, and counsel for the Defendants in the above-referenced action. Pursuant to Your Honor's Order dated October 8, 2024, this letter is being submitted jointly with Plaintiff to advise the Court of the agreed-upon schedule for conducting discovery in this matter.

On or about September 18, 2024, Plaintiff served demands for the production of documents and electronically stored information. This demand seeks copies of notices of disapproval (Document Request Nos. 1-4), internal policies and procedures and training documents (Document Request Nos. 5-10), communications "between and among License Division staff concerning Plaintiff (Document Request No. 11), and documents referenced in Defendants' Federal Rule of Civil Procedure 26(a)(1)(A) disclosures (Document Request No. 12). Defendants will produce any non-privileged documents that are responsive to Document Request Nos. 1-10 and 12 by November 25, 2024, and any non-privileged documents that are responsive to Document Request No. 11 by January 24, 2025. The deposition of Plaintiff is currently scheduled for November 4, 2024. Any interrogatories pursuant to Federal Rule of Civil Procedure 33 shall be served by November 25, 2024. Any additional requests for the production of documents shall also be served by November 25, 2024. Any requests for admission pursuant to Federal Rule of Civil Procedure 36 shall be served by January 31, 2025. The deadline to complete all fact discovery is February 28, 2025.

Respectfully submitted,

/s/

Nicholas Ciappetta
Senior Counsel